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8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE DISTRICT OF ARIZONA**

10 **Patricia Hubbard,**

11
12 **Plaintiff,**

13 **-against-**

14 **Zions Debt Holdings, LLC,**

15 **Defendant.**
16
17

Civil Case Number:
2:24-cv-00237-JJT

DECLARATION

18
19 **DECLARATION OF PLAINTIFF PATRICIA HUBBARD IN**
20 **SUPPORT OF HER MOTION FOR DEFAULT JUDGMENT**

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22 I, Patricia Hubbard, hereby affirm, that if called to testify in this case, I
23 would plead as follows:

- 24 1. I am the named Plaintiff in this matter, and make this Declaration based
25 upon my own personal knowledge.
26
27 2. I submit this declaration in support of my Motion for Default Judgment.
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3. I do not owe any money to Zions Debt Holdings or its client Dynamic Security & Sound, LLC, which was my former alarm company.
4. I certainly don't owe \$341.41 in 'interest' charges, or an additional \$60 of late charges.
5. When I received the collection letter from Zions seeking all of this money, I became frantic, worried and anxious about what would happen if I didn't take the offer to 'settle' for \$500. I am 86 years old and living on a fixed income and any money that this debt collector was going to take from me was going to bite into the funds I need for my daily living expenses. This kept me up at night and caused me to lose sleep, and I got so nervous that I reached out to a lawyer to help me.
6. This is also now on my credit report and has hurt my credit.
7. I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Dated: April 8, 2024

Patricia C. Hubbard
Patricia C. Hubbard (Apr 8, 2024 10:37 PDT)

PATRICIA HUBBARD







Declaration of Patricia Hubbard - Default Judgment

Final Audit Report

2024-04-08

Created:	2024-04-08
By:	Yitzchak Zelman (yzelman@marcuszelman.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAF8QbEPJN-Km7KvoR2GXmuUiEZyvroi1s

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-  Document created by Yitzchak Zelman (yzelman@marcuszelman.com)
2024-04-08 - 5:31:41 PM GMT- IP address: 70.23.15.142
-  Document emailed to hubbardaz@gmail.com for signature
2024-04-08 - 5:32:03 PM GMT
-  Email viewed by hubbardaz@gmail.com
2024-04-08 - 5:32:55 PM GMT- IP address: 72.212.92.166
-  Signer hubbardaz@gmail.com entered name at signing as Patricia C. Hubbard
2024-04-08 - 5:37:21 PM GMT- IP address: 72.212.92.166
-  Document e-signed by Patricia C. Hubbard (hubbardaz@gmail.com)
Signature Date: 2024-04-08 - 5:37:23 PM GMT - Time Source: server- IP address: 72.212.92.166
-  Agreement completed.
2024-04-08 - 5:37:23 PM GMT